

EXHIBIT C

UNSWORN DECLARATION

BARBARA A. WILHELM

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,	:	
Plaintiff	:	
	:	
v.	:	NO. 1:CV-01-1057
	:	
COMMONWEALTH OF PA.;	:	(JUDGE RAMBO)
PENNSYLVANIA STATE POLICE;	:	
COLONEL PAUL J. EVANKO,	:	
COMMISSIONER; LIEUTENANT	:	Electronically Filed
COLONEL THOMAS K. COURY; and	:	
CAPTAIN MICHAEL. D. SIMMERS,	:	
Defendants	:	

UNSWORN DECLARATION OF BARBARA A. WILHELM

I, Barbara A. Wilhelm, hereby affirm that the following is true and correct, under penalty of perjury:

1. On March 3, 2003, I began my duties as an Information Specialist (Deputy Press Secretary) in the Department of Corrections.
2. Even though I was paid at pay range 8, I reported to an Information Specialist (pay range 7), that was Acting as the Press Secretary.
3. I did not report to Michael Lukens, Press Secretary as identified in Defendants Exhibit # 94.

UNSWORN DECLARATION OF BARBARA A. WILHELM

PAGE 2

4. My primary duty consisted of spending approximately two hours per day cutting and pasting news articles from the Internet. I also retyped newspaper articles that had been faxed into the Press Office from institutions.
5. I was informed by the office Clerk Typist that she performed these duties prior to my placement in the office.
6. I received approximately one call per day from the media.
7. I also cut and pasted approximately two press releases, cut and paste template retirement greetings and performed related miscellaneous duties.
8. During my six-month tenure with the Department of Corrections', the Press Office focused on organizing fundraisers, coordinating employee entertainment, in the nature of Pierogi sales, flower sales, recipe sales, ham and cheese sandwich day, pretzel day, Easter egg hunt, clothing clearance sale, including a memorial service and in the collection of related monies.

9. In August 2003, I was provided a list of non-civil service position vacancies to review by the Office of Administration, Governor's Office.
10. I selected the Executive Policy Specialist 2 (pay range 9) position and was informed that I would be starting that job on September 3, 2003.
- 11 After being placed on the job, I was informed that the position was an Executive Policy Specialist 1 (pay range 8) position.
12. I was also informed that the Pennsylvania State Police funded my current position as an Executive Policy Specialist

I declare under penalty of perjury that the foregoing is true and correct.


Barbara A. Wilhelm 01/27/04
Barbara A. Wilhelm Date